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BY MESSENGER

Bruce P. Beausejour, Esq.
Verizon
185 Franklin Street, Room 1800
Boston, MA 02110

Re: D.T.E. Docket No. 01-20 - Verizon's August 17 Letter

Dear Bruce:

I am writing in response to your August 17, 2001, letter which discussed AT&T and WorldCom's joint responses to certain information requests. AT&T and WorldCom have already provided full and accurate answers to all of the information requests you mention. However, I will address each of these requests in an effort to resolve any lingering uncertainty.

VZ-ATT/WC 1-10: The basis for Mr. Baranowski's statement is explained in his testimony. We have not identified any specific documentation that would be responsive to this request.

VZ-ATT/WC 1-11: AT&T and WorldCom's response to VZ-ATT/WC 1-11 refers to their response to VZ-ATT/WC 1-21. AT&T and WorldCom's response to VZ-ATT/WC 1-21 was fully responsive and Verizon has never challenged that fact. Beyond the response to VZ-ATT/WC 1-21, we have not identified any specific documentation that would be responsive to VZ-ATT/WC 1-11.

VZ-ATT/WC 1-12: AT&T and WorldCom's response to VZ-ATT/WC 1-12 refers to their response to VZ-ATT/WC 1-24. Thus, please see my further response to VZ-ATT/WC 1-24, below.

VZ-ATT/WC 1-13: In response to VZ-ATT/WC 1-13, AT&T and WorldCom made it clear that the testimony referenced in the question was based on Mr. Baranowski's discussions with Mr. Donovan, on generally accepted industry practice, and on Verizon's own outside plant engineering practice. We have not identified any specific documentation that would be responsive to this request.

VZ-ATT/WC 1-15: As AT&T and WorldCom made clear in their response to this request, they had requested relevant documents from Verizon, but Verizon has failed to produce them. If Verizon has any documentation that is inconsistent with the testimony by Mr. Baranowski that is

the subject of this discovery request, please provide us with copies immediately. In the absence of any cooperation by Verizon, we do not have any specific documentation that would be responsive to this request that is not the subject of a protective order in another jurisdiction that prevents its production in this proceeding.

VZ-ATT/WC 1-17: Mr. Baranowski's rebuttal testimony refers at page 46 to "information provided by Verizon." Specifically, he is referring to page 6 of the Direct Testimony of Louis D. Minion, filed in this docket by Verizon on May 4, 2001. That is the supporting documentation to which this response was referring.

VZ-ATT/WC 1-18: The documentation referenced in this response is the Department's Phase 4-L Order from the *Consolidated Arbitrations* Docket, as referenced at page 47 of Mr. Baranowski's testimony.

VZ-ATT/WC 1-20: In response to VZ-ATT/WC 1-20, AT&T and WorldCom pointed to page 79 of Verizon's Panel Testimony which contains Verizon's own admission that the Donovan testimony referred to in VZ-ATT/WC 1-20 is fully supported and accurate. We have not identified any specific documentation other than Verizon's own panel testimony that would be responsive to this request.

VZ-ATT/WC 1-24: In response to VZ-ATT/WC 1-24, AT&T and WorldCom not only provided a full explanation of the logic behind using a 100 percent fill factor for fiber loops and dark fiber, but also provided Verizon with a quote from paragraph 192 of the FCC's USF Inputs Order that supports this testimony. The citation to this paragraph is: *Federal-State Joint Board on Universal Service*, CC Docket No 96-45, and *Forward-Looking Mechanism for High Cost Support for Non-Rural LECs*, CC Docket No. 97-160, Tenth Report and Order, No. FCC 99-304 (rel. Nov. 2, 1999), ¶ 192. We have not identified any additional documentation that would be responsive to this request.

VZ-ATT/WC 1-25: In response to VZ-ATT/WC 1-25, AT&T and WorldCom made it clear that the referenced testimony was based on Mr. Donovan's knowledge of Verizon's own written practices and the practices of other ILECs. Because the written internal policies of other ILECs were provided to Mr. Donovan under proprietary agreements signed in other jurisdictions, Mr. Donovan cannot provide them here. If you wish to see a copy of Verizon's own written practices, you should be able to easily obtain one from your own client. Furthermore, Mr. Donovan's statement that "[t]he generally accepted standard in the industry is to install enough plug-ins for existing service plus 6 months growth," is also supported by Verizon's response to CC-VZ 2-43 in which Verizon stated: "[l]ine cards are deployed to provision for six (6) months of growth."

VZ-ATT/WC 1-28: In VZ-ATT/WC 1-28, Verizon referred to page 22 of Mr. Donovan's rebuttal testimony and asked AT&T and WorldCom to provide all documents substantiating the

existence of “all major telephone companies who provide xDSL to customers over exclusively fiber technologies.” AT&T and WorldCom made it clear in their answer that Mr. Donovan never stated that there are “major telephone companies that provide xDSL to customers over *exclusively* fiber technologies” and explained why it was not practical or technically feasible to provide retail xDSL services to customers over “exclusively fiber technologies.” Because Mr. Donovan has never claimed that there are any telephone companies who provide xDSL to customers over *exclusively* fiber technologies, AT&T and WorldCom’s previous response was fully responsive. Mr. Donovan never made the statement erroneously attributed to him. We will not be providing documentation for a statement created by Verizon and wrongly attributed to Mr. Donovan.

VZ-ATT/WC 1-29: In response to VZ-ATT/WC 1-29, AT&T and WorldCom made it clear that Mr. Donovan’s testimony that “[n]o technician would trust a MLT loop length measurement...” was “based on his extensive hands-on experience in cable maintenance operations...” and went on to explain the logic behind Mr. Donovan’s conclusion. We have not identified any specific documentation that would be responsive to this request.

VZ-ATT/WC 1-41: In their initial response, AT&T and WorldCom specified where in their filings you can locate the requested support for Mr. Walsh’s testimony. We have not identified any additional documentation that would be responsive to this request.

VZ-ATT/WC 1-44: In VZ-ATT/WC 1-44, Verizon sought information relating to AT&T and WorldCom’s own operational experiences to date. AT&T and WorldCom objected on the grounds that such information is irrelevant to the present case which involves Verizon-MA’s forward-looking costs for providing UNEs. In light of the DTE’s August 31, 2001, ruling, we will attempt to provide a supplemental response to this information request as soon as practicable.

VZ-ATT/WC 1-45 and 1-46: AT&T and WorldCom’s initial response explicitly pointed to the location in previous filings in this docket where Verizon could find the requested support. We have not identified any additional documentation that would be responsive to this request.

VZ-ATT/WC 1-48: In response to VZ-ATT/WC 1-48, AT&T and WorldCom made it clear that the referenced testimony is based on Mr. Walsh’s professional experience while employed by both NYNEX and Bellcore. AT&T and WorldCom have already made it clear that Mr. Walsh’s testimony was not based on the review of any single specific readily identifiable document. We have not identified any specific documentation that would be responsive to this request.

VZ-ATT/WC 1-51: In response to VZ-ATT/WC 1-51, AT&T and WorldCom fully explained the basis for and logic behind the referenced testimony. AT&T and WorldCom also pointed to the relevant portion of Verizon’s NRCM and noted Verizon’s failure to provide any support for

its proposed cost. We have not identified any specific documentation that would be responsive to this request.

VZ-ATT/WC 1-56: In response to VZ-ATT/WC 1-56, AT&T and WorldCom made it clear that Mr. Walsh's testimony regarding the NOC total time required to turn up a single DID in a manual environment was "based on personal observations made while acting as a management consultant to another company." AT&T and WorldCom have already made it clear that Mr. Walsh's testimony was not based on the review of any single specific readily identifiable document. We have not identified any specific documentation that would be responsive to this request.

VZ-ATT/WC 1-67: The basis for this portion of Mr. Turner's testimony is fully explained in his testimony. We have not identified any specific documentation that would be responsive to this request.

VZ-ATT/WC 1-70: In response to VZ-ATT/WC 1-70, AT&T and WorldCom made it clear that Mr. Turner's testimony regarding the appropriate distance for most common transport was based on his review of filings in other proceedings and on the ALJ's recommendation in the New York UNE proceeding. Because the materials from the Texas, Oklahoma, and Kansas proceedings referred to in the original answer were filed as proprietary materials subject to a protective order, Mr. Turner is legally prevented from providing them to Verizon in this proceeding. I refer you again, however, to the New York ALJ's conclusion that the 12 miles recommended by Mr. Turner was a far more appropriate distance than the 33.4 miles recommended by Verizon. We have not identified any additional documentation that would be responsive to this request.

VZ-ATT/WC 1-71: AT&T and WorldCom's response to VZ-ATT/WC 1-71 refers to their response to VZ-ATT/WC 1-70. Thus, please see my further discussion of VZ-ATT/WC 1-70, above.

VZ-ATT/WC 1-88: In response to VZ-ATT/WC 1-88, AT&T and WorldCom made it clear that the referenced testimony was based on Mr. Turner's substantial professional experience. AT&T and WorldCom have also made it clear that Mr. Turner's testimony was not based on the review of any single specific readily identifiable document. We have not identified any specific documentation that would be responsive to this request.

VZ-ATT/WC 1-89: In response to VZ-ATT/WC 1-89, AT&T and WorldCom made it clear that Mr. Turner's conclusion that "the ratio between material and total installed cost for electronic switching equipment is totally unrelated to the appropriate ration for DC power equipment" was based on his extensive professional experience. Furthermore, AT&T and WorldCom provided Verizon with references to FCC documentation that fully supports Mr. Turner's conclusion. We have not identified any additional documentation that would be responsive to this request.

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VZ-ATT/WC 1-95: AT&T and WorldCom provided a full explanation in this response, and referred Verizon to its own cost study submission regarding collocation power. We have not identified any additional documentation that would be responsive to this request.

VZ-ATT/WC 2-9: AT&T and WorldCom's response to VZ-ATT/WC 2-9 is fully responsive. As that answer makes clear, the "embedded Verizon inefficiencies are those costs which Verizon incurs in operating and maintaining its embedded network compared with the lower operating and maintenance costs attributable to an efficient forward-looking network." The comparison between Verizon's cost model, which is based on its imbedded inefficient network and the HAI model, which models a forward-looking efficient network is the core of this case. Therefore, almost every document produced by all of the parties in this case is responsive to VZ-ATT/WC 2-9. Mr. Baranowski was not relying upon any specific additional documentation.

I hope that this has served to resolve any uncertainty regarding these discovery responses. Please call if you have any questions, or wish to discuss these matters further.

Very truly yours,

Kenneth W. Salinger

pc: Service List (by electronic mail only)